

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

VANESSA ROUMILHAC,)	
)	
Plaintiff,)	
)	CIVIL ACTION
v.)	
)	NO. _____
CARIS SCIENCE, INC. D/B/A CARIS)	
LIFE SCIENCES, HAMILTON)	
EXHIBITS, LLC, SHO-LINK, INC.,)	
FREEMAN EXPOSITIONS, LLC, D/B/A)	
FREEMAN EXPOSITIONS, INC.,)	
FREEMAN EXPOSITIONS, LTD.,)	
FREEMAN AUDIO VISUAL, LLC D/B/A)	
FREEMAN AUDIO VISUAL, INC. AND)	
FREEMAN AUDIO VISUAL)	
SOLUTIONS, INC., EXHIBIT SURVEYS,)	
LLC D/B/A EXHIBIT SURVEYS, INC.,)	
STAGE RIGGING, INC., THE FREEMAN)	
COMPANY, LLC, FREEMAN)	
ELECTRICAL, LLC D/B/A FREEMAN)	
ELECTRICAL INC., FREEMAN DIGITAL)	
VENTURES, LLC D/B/A FREEMAN)	
VENTURES, INC., and JOHN DOE,)	
)	
Defendants.)	

NOTICE OF REMOVAL

Now comes Defendant Freeman Electrical, LLC and files this Notice of Removal to the United States District Court for the Northern District of Georgia, showing the Court as follows:

1.

This Removal pursuant to 28 U.S.C. § 1441 et seq. is based upon diversity of citizenship under 28 U.S.C. § 1332.

2.

This lawsuit was filed in the State Court of Fulton County, Georgia under case number 20EV005990. The lawsuit was filed on October 13, 2020, less than one year prior to the date of removal.

3.

Defendant Freeman Electrical, LLC first received a copy of the Summons and Complaint on August 4, 2021, the date upon which Defendant was served with process. A copy of all process with which Defendant Freeman Electrical, LLC was served is attached hereto as Exhibit 1, which includes the Summons for this Defendant, Plaintiff's Second Amended Complaint for Damages, Plaintiff's First Interrogatories to the Freeman Defendants, Plaintiff's First Request for Production of Documents to the Freeman Defendants, and Plaintiff's First Request for Admissions to the Freeman Defendants.

4.

As shown by Plaintiff's Second Amended Complaint, Plaintiff is an individual who is a resident of the French Republic.

5.

As shown by the Plaintiff's Second Amended Complaint, the Defendants in the case are various corporations, which are residents of various states in the United States, but none of the Defendants is a resident of Georgia.

6.

There is one unknown individual Defendant named as "John Doe," and no residency is listed for this person. Pursuant to 28 U.S.C. § 1441(b)(1), the citizenship of defendants sued under fictitious names shall be disregarded.

7.

All Defendants which have been joined and served consent to the Removal.

8.

The amount in controversy is well in excess of the Court's jurisdictional minimum of \$75,000. This is a personal injury case, and the amount of damages sought is not specified in Plaintiff's Complaint. However, Plaintiff's pre-suit settlement demand to Defendant Caris Science, Inc. was \$1,750,000. Defendant Freeman Electrical, LLC therefore asserts that the amount in controversy is \$1,750,000.

This 3rd day of September, 2021.

Respectfully submitted,

WOOD & SOLIS, LLP

/s/ David H. Wood
DAVID H. WOOD
Georgia Bar No. 775063
Attorney for Defendant Freeman
Electrical, LLC.

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CERTIFICATE OF SERVICE

On this day, I served the following counsel of record from the State Court case
with a copy of this Notice of Removal via United States Mail:

Katherine L. McArthur
Lindsey S. Macon
McArthur Law Firm
1201 Peachtree Street, N.E.
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Alan D. Ness
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Peachtree Coners, GA 30092

This 3rd day of September, 2021.

/s/ David H. Wood
DAVID H. WOOD